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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado corporation,  
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LIMITED, a Hong Kong company;  
 SHENZHEN GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual, ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTVPAD LTD. COMPANY d/b/a  
 NEWTVPAD.COM a/k/a TVPAD USA, a  
 Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a E-  
 DIGITAL, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 MMM (AJWx)**

**REPLY IN FURTHER  
 SUPPORT OF PLAINTIFFS'  
 MOTION FOR DEFAULT  
 JUDGMENT AGAINST  
 DEFENDANTS CREATE NEW  
 TECHNOLOGY (HK)  
 LIMITED AND HUA YANG  
 INTERNATIONAL  
 TECHNOLOGY LIMITED;  
 DECLARATIONS OF  
 GEORGE WUKOSON AND  
 NICHOLAS BRAAK WITH  
 EXHIBITS A THROUGH C**

Date: November 23, 2015

Time: 10:00 a.m.

Courtroom: 780

Judge: Hon. Margaret M.  
 Morrow

Complaint Filed: March 13, 2015

1 Plaintiffs China Central Television, China International Communications Co.,  
 2 Ltd., TVB Holdings (USA), Inc. and DISH Network L.L.C. (collectively “Plaintiffs”)  
 3 respectfully request that Plaintiffs’ Motion for Default Judgment Against Create New  
 4 Technology (HK) Limited and Hua Yang International Technology Limited  
 5 (“Motion for Default Judgment”) be granted for the reasons set forth in Plaintiffs’  
 6 moving papers and in the accompanying Supplemental Declaration of Nicholas  
 7 Braak (“Braak Decl.”) and Supplemental Declaration of George Wukoson  
 8 (“Wukoson Decl.”), and given the failure of Create New Technology (HK) Limited  
 9 (“CNT”) and Hua Yang International Technology Limited (“HYIT”) to oppose the  
 10 Motion.

11 Plaintiffs filed the Motion for Default Judgment on September 14, 2015, and  
 12 immediately thereafter served their motion papers on CNT and HYIT at their  
 13 registered offices in Hong Kong. In a scheduling notice issued September 23, 2015,  
 14 the Court set October 19, 2015 as the deadline for CNT and HYIT to file any  
 15 opposition. *See* Dkt. No. 130. CNT and HYIT failed to file any Opposition. In light  
 16 of CNT’s and HYIT’s failure to file any opposition, Plaintiffs respectfully request  
 17 that their Motion for Default Judgment be granted in its entirety.

18 In addition, Plaintiffs have concurrently submitted an Amended Proposed  
 19 Order Granting Default Judgment and Permanent Injunctive Relief (“Amended  
 20 Proposed Order”), with several proposed changes to the language of the proposed  
 21 order they initially submitted. Plaintiffs propose these amendments in order to obtain  
 22 more effective relief, in light of CNT’s extensive efforts to evade Plaintiffs’ attempts  
 23 to enforce this Court’s Preliminary Injunction issued on June 11, 2015 (“PI Order”).  
 24 *See* Wukoson Decl., Ex. A (redline comparison showing changes in Amended  
 25 Proposed Order). Specifically, Plaintiffs propose these amendments for the following  
 26 reasons.

27 First, some of the Internet Service Providers (“ISPs”) on whom Plaintiffs have  
 28 served the PI Order have raised technical questions concerning the scope of the

1 order. For example, an ISP has contended that although it admittedly provides  
 2 connections necessary for the content on Defendants' servers to be accessed,  
 3 technically it does not provide web, server or file hosting services because it does not  
 4 have physical custody of the servers. Wukoson Decl. ¶ 3. Plaintiffs thus propose  
 5 adding more precise technical language to Paragraphs 9 and 15-17 of the Amended  
 6 Proposed Order to clarify the scope of relief for ISP personnel who will receive  
 7 notice of the permanent injunction.

8 Second, in an effort to evade Plaintiffs' efforts to enforce the PI Order, CNT  
 9 has taken various steps to keep the TVpad device and its illegal content online,  
 10 including by changing the ISPs and servers that host the Infringing TVpad Apps.  
 11 Wukoson Decl. ¶ 5; Braak Decl. ¶ 6. Plaintiffs thus propose updating Exhibit C to the  
 12 Amended Order to include a list of the new ISPs and IP addresses CNT and HYIT  
 13 are now using to operate the TVpad devices and the Infringing TVpad Apps and to  
 14 stream Plaintiffs' copyrighted programming. For the same reasons – and because  
 15 Plaintiffs anticipate that CNT will continue to change ISPs and servers even after  
 16 entry of a permanent injunction – Plaintiffs re-emphasize their need for the relief  
 17 requested in Paragraph 18 of the proposed Permanent Injunction, which calls for the  
 18 disabling, and elective transfer to Plaintiffs, of the domain names identified in  
 19 Exhibit C, which may provide a more effective means of shutting down the illegal  
 20 TVpad service than simply chasing after ever-changing ISPs and IP addresses.

21 Third, out of an abundance of caution, Plaintiffs also propose updating Exhibit  
 22 D and Paragraph 15 in the Amended Proposed Order to specify that several  
 23 commercial shipping companies that CNT and HYIT have used to ship large  
 24 amounts of TVpad devices to the United States, are included in the definition of  
 25 “distributors of TVpads.”  
 26  
 27  
 28

1 DATED: October 26, 2015

2 DAVIS WRIGHT TREMAINE LLP  
3 CARLA A. McCAULEY  
4 ROBERT D. BALIN (*pro hac vice*)  
5 LACY H. KOONCE, III (*pro hac vice*)  
6 SAMUEL BAYARD (*pro hac vice*)  
7 GEORGE WUKOSON (*pro hac vice*)

8 By: /s/Carla A. McCauley  
9 Carla A. McCauley

10 Attorneys for Plaintiffs  
11 CHINA CENTRAL TELEVISION; CHINA  
12 INTERNATIONAL COMMUNICATIONS  
13 CO., LTD.; TVB HOLDINGS (USA), INC.;  
14 AND DISH NETWORK L.L.C.  
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**DECLARATION OF GEORGE WUKOSON**

**SUPPLEMENTAL DECLARATION OF GEORGE WUKOSON**

I, George Wukoson, declare as follows:

1. I am an attorney licensed to practice law in the State of New York and before the bars of the Southern and Eastern Districts of New York. I am an associate with the law firm of Davis Wright Tremaine LLP ("DWT"), counsel to the Plaintiffs in this action, admitted pro hac vice. I submit this declaration in support of Plaintiffs' Motion for Default Judgment and as a supplement to my declaration dated September 14, 2015. I have personal knowledge of the facts contained herein and in my declaration dated September 14, 2015, and, if called upon as a witness, I could and would testify competently about the facts set forth herein and in my September 14, 2015 declaration.

2. I have been responsible for communicating with various Internet Service Providers ("ISPs") concerning enforcement efforts by Plaintiffs pursuant to the Court's Preliminary Injunction issued on June 11, 2015 ("PI Order"). Specifically, I have contacted the ISPs identified on Exhibit C to the PI Order to notify them that under that Order they are required to shut down the servers associated with the identified IP addresses, through which Defendants stream Plaintiffs' copyrighted programming or otherwise operate the TVpad and Infringing TVpad applications.

3. In response to those efforts, several ISPs have refused or delayed compliance with the Court's PI Order, with some ISPs asserting that the prohibitions in the PI Order do not apply to them. Just as an example, one ISP has contended that it does not provide web, server or file hosting services to Defendants' servers because—although it admittedly provides connections necessary for the content on those servers to be accessed—it does not have physical custody of the servers.

4. To ensure future compliance by ISPs, Plaintiffs propose certain technical edits to the language in the Proposed Order Granting Plaintiffs' Motion for Default Judgment and Permanent Injunction Against Defendants Create New Technology (HK) Limited and Hua Yang International Technology Ltd. ("Proposed

1 Permanent Injunction”) at Paragraphs 9 and 15-17. These changes merely clarify the  
 2 requirement in the Proposed Permanent Injunction that web, server and file hosting  
 3 service providers cease providing those services to the TVpad device, in language  
 4 that we believe will be better understood by the ISPs, and will increase compliance  
 5 by those ISPs in shutting down servers that are associated with the TVpad device and  
 6 the Infringing TVpad Apps.

7 5. Some of the ISPs on which we have served the PI Order have complied  
 8 with the Court’s order and ceased providing hosting services to Defendants. In  
 9 response, however, Defendants (seeking to evade shut-down of the Infringing TVpad  
 10 Apps) have adopted new and additional servers associated with new IP addresses,  
 11 according to Plaintiffs’ investigator, Nicholas Braak, who has been monitoring the  
 12 status of the TVpad servers during our enforcement efforts. In addition, Defendants  
 13 have instructed TVpad users on their Facebook page to redirect their TVpad devices  
 14 to a new Domain Name System (DNS) located at 8.8.8.8 on the TVpad when a user’s  
 15 TVpad device will no longer function.

16 6. Based on the new IP addresses that Defendants are now using to host  
 17 TVpad content, Mr. Braak has updated Exhibit 65 to his September declaration to  
 18 add the most recent servers, IP addresses and domain names that Defendants are  
 19 using to provide the TVpad Service. This updated exhibit to Mr. Braak’s declaration  
 20 is attached to the Proposed Permanent Injunction and the Declaration of Mr. Braak as  
 21 **Exhibit C.**

22 7. We have also amended Exhibit D to the revised Proposed Permanent  
 23 Injunction to include shippers United Parcel Service (“UPS”) and DHL Express  
 24 (“DHL”) and the account numbers with UPS and DHL used by Defendants to ship  
 25 TVpad devices, as identified in Exhibits 12, 14, 22-24 and 64 to the Declaration of  
 26 Carla M. McCauley, dated September 14, 2015.

27 8. A redline comparison of the Proposed Permanent Injunction submitted  
 28 herewith versus the proposed default judgment and permanent injunction order

1 submitted with Plaintiffs' initial papers in support of the present motion on  
2 September 14, 2015 [Dkt. No. 123-1] (the "Prior Proposed Order") is attached hereto  
3 as **Exhibit A**.

4 9. Redline comparisons of Exhibits C and D to the Proposed Permanent  
5 Injunction submitted herewith versus Exhibits C and D to the Prior Proposed Order  
6 are attached hereto as **Exhibit B**.

7 I declare under penalty of perjury under the laws of the United States of  
8 America that the foregoing is true and correct.

9 Executed this 26<sup>th</sup> day of October, 2015.



George Wukoson



**DECLARATION OF NICHOLAS BRAAK**

**SUPPLEMENTAL DECLARATION OF NICHOLAS BRAAK**

I, Nicholas Braak, declare as follows:

1. I am a licensed private investigator, and have worked as a computer forensics investigator for more than nine years. I am employed by the Mintz Group LLC (“Mintz”), a corporate research and investigations firm based in New York, with offices in Washington D.C., London, Hong Kong, Beijing, Nairobi, and six other cities throughout the world. I have worked for Mintz since January 2014. During my career in information security and digital forensics, I have participated in hundreds of investigations involving intellectual property rights, cybercrime, Internet forensics, and other matters. I make this declaration as a supplement to my September 11, 2015 declaration, and in further support of Plaintiffs’ motion for default judgment. I have personal knowledge of the facts contained herein and, if called upon as a witness, I could and would testify competently about these facts, except for those matters stated expressly upon information and belief, which matters I believe to be true.

2. Mintz was retained in 2014 by Plaintiffs China Central Television (“CCTV”), China International Communications Co., Ltd. (“CICC”), TVB Holdings (USA), Inc. (“TVB (USA)”) and DISH Network L.L.C. (“DISH”) (collectively “Plaintiffs”) to investigate the TVpad device manufactured by defendant Create New Technology (HK) Limited (“CNT”) and the unlicensed international television programming provided to U.S. consumers through the TVpad device (the “TVpad Service”).

3. I have managed the forensic investigation for this matter and conducted research at the direction of Christopher Weil, the lead investigator. During the course of our investigation, Mintz purchased several TVpad3 and TVpad4 devices. I personally forensically tested each of these TVpad devices and confirmed their consistent functionality among TVpads of the same model. I also personally viewed and caused to be recorded streamed content delivered by these devices and have

1 periodically monitored the continued availability of that streamed content through  
2 these devices and the TVpad Service.

3 4. As part of my forensic investigation, I have identified the IP addresses  
4 and domain names that the TVpad device and its Infringing TVpad Apps use to  
5 function and deliver CCTV and TVB television programming. I have also  
6 continually monitored the TVpad devices purchased by Mintz to determine whether  
7 the TVpad devices continue to stream CCTV and TVB programming through the  
8 applications available in the TVpad Store.

9 5. In my September 11, 2015 declaration, I identified in Exhibit 65 a series  
10 of Internet servers by IP addresses and/or domain names that communicate with the  
11 TVpad device and the Infringing TVpad Apps and that: (1) authenticate the TVpad  
12 device as an authentic TVpad device originating with CNT, which is a necessary  
13 precursor for the Infringing TVpad Apps to function; (2) download to the TVpad  
14 device the elements of the software it uses, including the “TVpad Store”—from  
15 which Infringing TVpad Apps and other apps are made available to users; (3)  
16 download Infringing TVpad Apps; and (4) stream CCTV and TVB programming.

17 6. Since compiling the list of information in Exhibit 65 to my September  
18 11 declaration, the IP addresses of servers with which the TVpad device and  
19 Infringing TVpad Apps communicate continues to change as Defendants take steps  
20 to evade Plaintiffs’ efforts to enforce this Court’s preliminary injunction order. I  
21 have therefore updated Exhibit 65 to add the most recent servers, IP addresses and  
22 domain names that Defendants are now using to stream Plaintiffs’ programs through  
23 the TVpad device. A true and correct copy of the updated list is attached hereto as  
24 **Exhibit C.**

25 7. Defendants’ speedy adoption of new IP addresses to evade this Court’s  
26 preliminary injunction order is the key reason that I recommended in my September  
27 11 declaration, and continue to recommend, that the most effective means of  
28 stopping the unauthorized streaming of CCTV and TVB television programming

1 through the Infringing TVpad Apps is to order domain name registries and/or  
2 registrars that control the domain names used by Defendants to disable, and at  
3 Plaintiffs' election transfer, these domain names to the Plaintiffs. There are two  
4 primary reasons that disabling and then transferring the domain names to the  
5 Plaintiffs will be more effective in halting Defendants' illegal streaming of CCTV  
6 and TVB programs than merely shutting down IP addresses. First, IP addresses  
7 typically change frequently, whereas domain names are usually a "stickier," more  
8 enduring means of locating a particular server. Second, my testing indicates that  
9 changing the domain names used by the TVpad may require a manual update by  
10 users of the TVpad device. While Defendants can and likely will use new domain  
11 names in the place of any disabled domain names, they will not be able to add  
12 domain names as quickly as they have added IP addresses because it is simply more  
13 cumbersome to add domain names.

14 8. I have also noted on TVpad's websites that in recent days TVpad has  
15 instructed TVpad users to redirect their devices to a new Domain Name System  
16 (DNS) server located at 8.8.8.8 when their TVpad devices stop working. This  
17 process allows TVpad users' devices to more quickly locate servers at new IP  
18 addresses that replace servers that have been recently disabled, due to Plaintiffs'  
19 enforcement efforts. However, Defendants' advice to users to redirect their devices  
20 to a new DNS server will not be effective if the domain names used by Defendants  
21 are disabled. For this additional reason, I also continue to recommend that disabling

22 ///

23 ///

1 domain names is the most effective means of stopping unauthorized streaming of  
2 Plaintiffs' copyrighted television programs by the TVpad Service.

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct.

5 Executed this 26th day of October, 2015 in New York, New York.

6  
7  
8   
Nicholas Braak

## **EXHIBIT A**

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a China  
company; CHINA INTERNATIONAL  
COMMUNICATIONS CO., LTD., a China  
company; TVB HOLDINGS (USA), INC., a  
California corporation; and DISH NETWORK  
L.L.C., a Colorado limited liability company,

Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
LIMITED, a Hong Kong company; HUA  
YANG INTERNATIONAL TECHNOLOGY  
LTD., a Hong Kong company; SHENZHEN  
GREATVISION NETWORK  
TECHNOLOGY CO. LTD., a China  
company; CLUB TVPAD, INC., a California  
corporation; BENNETT WONG, an  
individual; ASHA MEDIA GROUP INC.  
d/b/a TVPAD.COM, a Florida corporation;  
AMIT BHALLA, an individual; NEWTPAD  
LTD CO. a/k/a TVPAD USA, a Texas  
corporation; LIANGZHONG ZHOU, an  
individual; HONGHUI CHEN d/b/a e-Digital,  
an individual; JOHN DOE 1 d/b/a BETV;  
JOHN DOE 2 d/b/a YUE HAI; JOHN DOE 3  
d/b/a 516; JOHN DOE 4 d/b/a HITV; JOHN  
DOE 5 d/b/a GANG YUE; JOHN DOE 6 d/b/a  
SPORT ONLINE; JOHN DOE 7 d/b/a GANG  
TAI WU XIA; and JOHN DOES 8-10,

Defendants.

) Case No.

) **CV 15-1869 MMM (AJWx)**

) **[PROPOSED] ORDER**  
) **GRANTING PLAINTIFFS'**  
) **MOTION FOR DEFAULT**  
) **JUDGMENT AND PERMANENT**  
) **INJUNCTION AGAINST**  
) **DEFENDANTS CREATE NEW**  
) **TECHNOLOGY (HK) LIMITED**  
) **AND HUA YANG**  
) **INTERNATIONAL LIMITED**  
) **TECHNOLOGY LTD.**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

The Court has considered the Motion for Default Judgment and Permanent Injunction of Plaintiffs China Central Television (“CCTV”), China International Communications Co., Ltd. (“CICC”), TVB Holdings (USA), Inc. (“TVB (USA)”), and DISH Network L.L.C. (“DISH”) (collectively, “Plaintiffs”), against Defendants Create New Technology (HK) Limited and Hua Yang International Technology Limited (“Defendants”) and all documents in support thereof. Good cause appearing to enter the requested relief, IT IS HEREBY ORDERED that Plaintiffs’ Motion is GRANTED, and Judgment shall be and hereby is entered against Defendants in this action as follows:

1. For purposes of this Default Judgment and Permanent Injunction, the following definitions shall apply:

a. “Plaintiffs’ Copyrighted Programming” shall mean each of those broadcast television programming works, or portions thereof, whether now in existence or later created, in which the Plaintiffs, or any of them (or any parent, subsidiary, or affiliate of any of the Plaintiffs), owns or controls an exclusive right under the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.*, including without limitation all copyrighted programs identified in **Exhibit A** hereto;

b. “TVpad Device” shall mean the television set-top devices marketed as TVpad3 and TVpad4, and any other set-top devices that offer for download or allow use of the Infringing TVpad Apps;

c. “TVpad Store” shall mean any combination of software and/or services whereby users can select and download software applications onto the TVpad Device;

d. “TVpad Apps” shall mean software applications and associated services that are designed for use on the TVpad Device and available for download through the TVpad Store;



1 e. "Infringing TVpad Apps" shall mean any TVpad App or similar  
2 application whereby Plaintiffs' Copyrighted Programming is publicly  
3 performed without authorization by transmission to members of the public,  
4 including but not limited to the TVpad Apps identified in **Exhibit B** hereto;

5 f. "TVpad Service" shall mean transmission of Plaintiffs  
6 Copyrighted Programming through the TVpad Device and the Infringing  
7 TVpad Apps;

8 g. "Comparable System" shall mean any device, data transmission  
9 service or application that provides users unauthorized access to Plaintiffs'  
10 Copyrighted Programming, using any peer to peer or internet based  
11 transmission, file sharing or content delivery technology;

12 h. "TVpad Websites" shall mean the websites located at the domain  
13 names itvpad.com, mtvpad.com and tvpadfans.com and any other websites  
14 maintained by Defendants or pursuant to their direction, that distribute, sell,  
15 advertise or promote any TVpad Device, the TVpad Service, or any  
16 Comparable System, or are otherwise utilized in furtherance of any of the  
17 activities enjoined in Paragraphs 9, 10 and 13 hereinbelow;

18 i. "CCTV Marks" shall mean the word marks "CCTV" and "CCTV  
19 AMERICA" and the stylized CCTV logo, and the design mark "CCTV  
20 AMERICA" registered with the U.S. Patent and Trademark Office, Application  
21 Serial No. 86239098;

22 j. "TVB Marks" shall mean (a) the word mark JADE (U.S. Serial  
23 No. 76406416); (b) the JADE logo (U.S. Serial No. 76445114 and U.S.  
24 Application Serial No. 86171201); (c) the word mark TVB (U.S. Application  
25 Serial No. 86171162); and the Chinese-language word mark for THE JADE  
26 CHANNEL (U.S. Serial No. 76407746); and

27 k. "Plaintiffs' Marks" shall mean the CCTV Marks and TVB Marks.  
28

2. This Court has personal jurisdiction over Defendants and jurisdiction over the subject matter at issue pursuant to 28 U.S.C. §§ 1331, 1338 and 1367, as well as 15 U.S.C. § 1121(a). This Court has continuing jurisdiction to enforce the terms and provisions of this Default Judgment and Permanent Injunction.

3. Plaintiffs' copyrights in Plaintiffs' Copyrighted Programming are valid and enforceable.

4. Plaintiffs' Marks are valid and enforceable.

5. Defendants have committed and continue to commit the following acts:

a. transmitting video of Plaintiffs' Copyrighted Programming into the United States without authorization through the TVpad Device and Infringing TVpad Apps;

b. retransmitting Plaintiffs' Copyrighted Programming to TVpad users, capturing television programs and converting them to Internet-friendly formats, streaming such content using peer-to-peer technology, directly streaming content to the United States, and making and storing copies of Plaintiffs' Copyrighted Programming for later playback at the request of TVpad users;

c. unlawfully publicly performing and/or authorizing others to publicly perform Plaintiffs' Copyrighted Programming;

d. unlawfully reproducing and distributing and/or authorizing others to reproduce and distribute Plaintiffs' Copyrighted Programming;

e. unlawfully publicly displaying and/or authorizing others to publicly display Plaintiffs' Copyrighted Programming in the United States;

f. marketing the availability of Plaintiffs' Copyrighted Programming through the TVpad Device and Infringing TVpad Apps;

g. manufacturing, distributing, maintaining and marketing the TVpad Service, the TVpad device and the TVpad Store, and Infringing TVpad Apps, all with the object of promoting their use to infringe Plaintiffs' Copyrighted

1 Programming, thereby knowingly and intentionally inducing infringement of  
2 Plaintiffs' Copyrighted Programming and materially contributing to the  
3 continued infringement of Plaintiffs' Copyrighted Programming by third  
4 parties;

5 h. continuing the acts detailed in ¶¶ 5(a)-(g) above after receiving  
6 cease and desist letters from Plaintiffs, after the commencement of this action  
7 and after and in violation of the Preliminary Injunction Order in this action [Dkt.  
8 No. 98]; and

9 i. using Plaintiffs' Marks to advertise the TVpad Service and falsely  
10 representing that Plaintiffs have authorized the streaming of their television  
11 programming on the TVpad, creating consumer confusion regarding Plaintiffs'  
12 relationship, authorization, sponsorship and affiliation with Defendants'  
13 products and services.

14 6. Defendants' acts constitute:

15 a. direct infringement, contributory infringement and vicarious  
16 infringement of Plaintiffs' Copyrighted Programming in violation of the  
17 Copyright Act, 17 U.S.C. § 101 *et seq.*;

18 b. federal trademark infringement and unfair competition under the  
19 Lanham Act, 15 U.S.C. § 1125(a);

20 c. common law trademark infringement and unfair competition; and

21 d. violation of California Business and Professions Code § 17200 *et*  
22 *seq.*

23 7. Defendants are ordered to pay damages to Plaintiffs in the amount of  
24 \$326,360,691.

25 8. Defendants are ordered to pay Plaintiffs' attorneys fees in the amount of  
26 \$\_\_\_\_\_, and post-judgment interests, pursuant to 28 U.S.C. § 1961(a), "at a  
27 rate equal to the weekly average 1-year constant maturity Treasury yield, as published  
28

1 by the Board of Governors of the Federal Reserve System, for the calendar week  
2 preceding the date of the judgment.”

3 9. Defendants, and all of their parents, subsidiaries, affiliates, officers,  
4 agents, servants and employees, and all those persons or entities acting in active  
5 concert or participation with Defendants (including but not limited to parties that  
6 procure or provide sales, distribution, shipping or logistics services, primary and  
7 backup storage services, or web, server ~~and~~or file hosting services on behalf of  
8 Defendants, including but not limited to those parties listed in ~~Exhibit C~~Exhibits C  
9 and D) and all personas and entities who receive actual notice of this Order  
10 (collectively, the “Enjoined Parties”) are immediately and permanently enjoined from  
11 engaging in any of the following activities:

12 a. Distributing, selling, advertising, marketing or promoting any  
13 TVpad Device;

14 b. Transmitting, retransmitting, assisting in the transmission of,  
15 requesting transmission of, streaming, hosting or providing unauthorized  
16 access to, or otherwise publicly performing, directly or indirectly, by means of  
17 any device or process, Plaintiffs’ Copyrighted Programming;

18 c. Authorizing, hosting, reproducing, downloading, selling or  
19 otherwise distributing the Infringing TVpad Apps, including without limitation  
20 offering them in the TVpad Store, loading them onto any TVpad Device or any  
21 Comparable System, offering or providing them on Internet websites, or  
22 providing the Infringing TVpad Apps to consumers on separate media;

23 d. Creating or providing assistance to others who wish to create an  
24 Infringing TVpad App;

25 e. Advertising, displaying, marketing or otherwise promoting any of  
26 the Infringing TVpad Apps, including without limitation publicly displaying  
27 any of the Plaintiffs’ Copyrighted Programming in connection therewith or in  
28

1 connection with the TVpad Device or any Comparable System, including  
2 without limitation via the TVpad Websites;

3 f. Distributing, selling, advertising, marketing or promoting any  
4 TVpad Device that contains, connects to, or offers for download any Infringing  
5 TVpad App, or promotes any Infringing TVpad App through the inclusion of  
6 icons for said Infringing TVpad App;

7 g. Distributing, selling, advertising, marketing or promoting any  
8 TVpad Device that contains, connects to, offers for download, transmits, assists  
9 in the transmission of, streams, hosts, provides access to, or otherwise publicly  
10 performs, directly or indirectly, by means of any devise of process, Plaintiffs'  
11 Copyrighted Programming without permission;

12 h. Distributing, selling, advertising, marketing or promoting any  
13 Comparable System that contains, connects to, offers for download, transmits,  
14 assists in the transmission of, streams, hosts, provides access to, or otherwise  
15 publicly performs, directly or indirectly, by means of any devise of process,  
16 Plaintiffs' Copyrighted Programming without permission;

17 i. Providing or controlling servers which contain any of Plaintiffs'  
18 Copyrighted Programming; and

19 j. Assisting with end-user reproductions or transmissions of any of  
20 Plaintiffs' Copyrighted Programming through a tracker server, or any other  
21 server or software that assists users or devices in locating, identifying or  
22 obtaining reproductions or transmission of any of Plaintiffs' Copyrighted  
23 Programming, including from other users offering reproductions or  
24 transmissions of any of Plaintiffs' Copyrighted Programming;

25 k. Otherwise infringing Plaintiffs' rights in their Copyrighted  
26 Programming, whether directly, contributorily, vicariously or in any other  
27 manner.  
28

1           10. The Enjoined Parties are further immediately and permanently enjoined  
2 from engaging in any activities having the object or effect of fostering infringement of  
3 Plaintiffs' Copyrighted Programming, whether through the Infringing TVpad Apps or  
4 otherwise, including without limitation engaging in any of the following activities:

5           a. Advertising or promoting unauthorized access to or the  
6 availability of Plaintiffs' Copyrighted Programming;

7           b. Encouraging or soliciting others to transmit or reproduce  
8 Plaintiffs' Copyrighted Programming;

9           c. Encouraging or soliciting others to upload, post or index any files  
10 that constitute, correspond, point or lead to any of Plaintiffs' Copyrighted  
11 Programming;

12           d. Encouraging or soliciting others to offer transmission of Plaintiffs'  
13 Copyrighted Programming;

14           e. Providing technical assistance, support services or servers to  
15 others engaged in infringement of, or seeking to infringe, Plaintiffs'  
16 Copyrighted Programming;

17           f. Creating, maintaining, highlighting or otherwise providing access  
18 to lists or forums that include, refer to or signal the availability of Plaintiffs'  
19 Copyrighted Programming;

20           g. Including references to Plaintiffs' Copyrighted Programming or  
21 the Infringing TVpad Apps in promotional materials; and

22           h. Creating, maintaining or providing access to the Infringing TVpad  
23 Apps.

24           11. The Enjoined Parties shall not enter into any agreement or transaction  
25 whatsoever to sell, lease, license, assign, convey, distribute, loan, encumber, pledge or  
26 otherwise transfer, whether or not for consideration or compensation, any part of the  
27 system, software, source code, data file, other technology, domain names, trademarks,  
28

1 brands, or files used in connection with the TVpad Device, Infringing TVpad Apps or  
2 any Comparable System.

3 12. Defendants shall identify to Plaintiffs all domain names and IP  
4 addresses and the physical locations of all servers owned, leased or operated by any of  
5 the Enjoined Parties that are used in connection with the activities enjoined under  
6 Paragraphs 9 and 10, above, within 7 days of the entry of this Permanent Injunction.

7 13. Further, the Enjoined Parties are immediately and permanently enjoined  
8 from engaging in any of the following activities:

9 a. Using the CCTV or TVB Marks, or any other mark, design  
10 reproduction, copy or symbol that is a colorable imitation thereof, or confusing  
11 similar thereto, in connection with broadcasting or entertainment services, or  
12 related goods or services, not originating from or authorized by Plaintiffs;

13 b. Using the CCTV or TVB Marks, or any other mark, design  
14 reproduction, copy or symbol that is a colorable imitation thereof, in any  
15 manner likely to cause confusion, to cause mistake, or to deceive the  
16 consuming public;

17 c. Representing in any manner, or by any method whatsoever, that  
18 goods and services provided by the Enjoined Parties are licensed, sponsored,  
19 approved, authorized by, or originate from Plaintiffs or otherwise taking any  
20 action likely to cause confusion, mistake, or deception as to the origin,  
21 approval, sponsorship or license of such goods or services;

22 d. Committing any acts calculated or likely to cause consumers to  
23 believe that the Enjoined Parties' products and services are authorized by  
24 Plaintiffs;

25 e. Infringing or diluting, whether directly or indirectly, the  
26 distinctive quality of the CCTV Marks or the TVB Marks; and

27 f. Unfairly competing with Plaintiffs in any manner.  
28



14. As the Court has personal jurisdiction over Defendants and has concluded that the conduct of Defendants induces infringement of Plaintiffs' Copyrighted Programming in the United States under the copyright laws of the United States and infringes the CCTV Marks and TVB Marks under the trademark laws of the United States, this Permanent Injunction enjoins the conduct of Defendants wherever they may be found.

15. Third parties who provide sales ~~or~~, distribution, shipping or logistics services for the TVpad Device, including but not limited to the third party distributors identified in **Exhibit D** hereto, and who receive actual notice of this Order, are immediately and permanently enjoined from distributing, selling, advertising, marketing or promoting any TVpad Device and from providing any other services enjoined in Paragraphs 9, 10 and 13 hereinabove.

16. Third parties providing web, server and file hosting services, data center and colocation services, and primary and backup storage services (including but not limited to cloud storage services) used in connection with the activities enjoined under Paragraphs 9, 10 and 13 hereinabove, including but not limited to the third parties providing hosting services for the Internet servers identified in **Exhibit C** hereto; (including but not limited to servers providing streaming video, application files, TVpad Store functionality, initialization, operation and authentication) and who receive actual notice of this Order, are immediately and permanently enjoined from providing such hosting services to (i) any Enjoined Parties in connection with the activities enjoined under Paragraphs 9, 10 and 13 hereinabove; (ii) any server, IP address, domain name or website used in conjunction with the TVpad Device, Infringing TVpad Apps or any Comparable System; and (iii) the TVpad Websites.

17. Third parties providing services used in connection with the activities enjoined under Paragraphs 9, 10 and 13 hereinabove, including but not limited to back-end service providers, service providers routing traffic or providing bandwidth, content delivery networks and domain name server systems (~~e.g.,~~ including but not



1 limited to CloudFlare and DNSPod), search-based online advertising services (such as  
2 through paid inclusion, paid search results, sponsored search results, sponsored links,  
3 and Internet keyword advertising), domain name registration privacy protection  
4 services, providers of social media services (~~e.g.,~~ including but not limited to  
5 Facebook and Twitter)~~and,~~ user generated and online content services (~~e.g.,~~  
6 YouTube including but not limited to YouTube) and data security services (including  
7 but not limited to denial-of-service attack prevention, firewall and proxy services),  
8 who receive actual notice of this Order are permanently enjoined from providing such  
9 services to: (i) any Enjoined Parties in connection with the activities enjoined under  
10 Paragraphs 9, 10 and 13 hereinabove; (ii) any server, IP address, domain name or  
11 website used in conjunction with the TVpad Device, Infringing TVpad Apps or any  
12 Comparable System; and (iii) the TVpad Websites.

13 18. The domain name registries (including but not limited to VeriSign, Inc.)  
14 and/or registrars holding or listing the domain names itvpad.com, mtvpad.com or  
15 tvpadfans.com or one or more of the domain names used in connection with the  
16 activities enjoined under Paragraphs 9, 10 and 13 hereinabove (including but not  
17 limited to the domain names identified in **Exhibit C** hereto), and who receive actual  
18 notice of this Order, shall (1) temporarily disable these domain names, or any subset  
19 of these domain names specified by Plaintiffs, through a registry hold or otherwise,  
20 and make them inactive and non-transferable; and (2) at the direction of Plaintiffs,  
21 transfer these domain names to Plaintiffs' ownership and control, including, *inter alia*,  
22 by changing the registrar of record to the registrar of Plaintiffs' choosing.

23 19. Service by mail upon Defendants of a copy of this Default Judgment and  
24 Permanent Injunction once entered by the Court is deemed sufficient notice to  
25 Defendants under Federal Rule of Civil Procedure 65. It shall not be necessary for  
26 Defendants to sign any form of acknowledgement of service.

27 20. This Permanent Injunction shall bind the Enjoined Parties. Defendants  
28 shall provide a copy of this Permanent Injunction to their officers, agents, servants,

1 employees, attorneys, principals, shareholders, members, current and future  
2 administrators or moderators of the any online forums associated with Defendants, the  
3 TVpad Device, the TVpad Apps, or Comparable System.

4 21. Violation of this Permanent Injunction shall expose Defendants and all  
5 other persons bound by this Permanent Injunction to all applicable penalties,  
6 including contempt of Court.

7 22. Within 14 days of the date the Court enters this Permanent Injunction,  
8 Defendants shall file and serve a report in writing and under oath setting forth in detail  
9 the manner and form with which Defendants have complied with the Permanent  
10 Injunction.

11 23. The Court finds there is no just reason for delay in entering this Default  
12 Judgment and Permanent Injunction and, pursuant to Fed. R. Civ. P. 54(a), the Court  
13 direct immediate entry of this Default Judgment and Permanent Injunction.

14 24. The Court shall retain jurisdiction of this action to entertain such further  
15 proceedings and to enter such further orders as may be necessary or appropriate to  
16 implement and enforce the provisions of this Default Judgment and Permanent  
17 Injunction.

18 IT IS SO ORDERED.

19  
20 \_\_\_\_\_, 2015

\_\_\_\_\_  
21 Hon. Margaret M. Morrow  
22 Judge of the United States District Court  
23  
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**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address      | Date of detection | Domain Name        | Function                                     |
|---|-----------------|-------------------|--------------------|--|
| ClearDDoS Technologies<br>Los Angeles, California       | 103.240.140.142 | September 3, 2015 | xz.boxepg.com      | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.71    | September 3, 2015 | xzsec.boxepg.com   | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.65    | September 3, 2015 | xzsec.padepg.com   | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.72    | September 3, 2015 | xzsec.listebox.com | Initialization<br>TVpad3 Operational Content |
| Perfect International, Inc Los<br>Angeles, California   | 70.36.96.245    | September 3, 2015 | stbepg.wsxlist.com | TVpad3 Authentication                        |
| Enzu<br>Los Angeles, California                         | 23.245.203.54   | September 3, 2015 | stbepg.qaxlist.com | TVpad4 Authentication                        |
| Defender cloud international<br>Los Angeles, California | 23.234.41.173   | September 3, 2015 |                    | Streaming Video                              |
| ClearDDoS Technologies<br>Los Angeles, California       | 104.193.92.42   | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.101 | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.39    | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.167.81.51   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.188.195 | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.26    | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.188.194 | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.9.243   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.172.19  | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.33    | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.82  | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.181.227 | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.182.3   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.4.227   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.18.227  | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies                                  | 104.171.230.74  | September 3, 2015 |                    | Streaming Video                              |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address   | Date of detection | Domain Name        | Function                                       |
|---|--|-------------------|--------------------|--|
| San Jose, California                                    |  |                   |                    |  |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.19   | September 3, 2015 |                    | Streaming Video                                |
| ClearDDoS Technologies<br>Los Angeles, California       | 162.221.13.98  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.89.100.59   | September 3, 2015 |                    | Streaming Video                                |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.75   | September 3, 2015 |                    | Streaming Video                                |
| ZeroDDOS<br>Los Angeles, California                     | 104.201.61.3   | September 3, 2015 |                    | Streaming Video                                |
| ZeroDDOS<br>Los Angeles, California                     | 167.88.205.116   | September 3, 2015 |                    | Streaming Video                                |
| Cloudflare  | 104.20.4.235   | September 3, 2015 |                    | Streaming Video                                |
| Defender cloud international<br>Los Angeles, California | 23.234.41.171  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 104.202.82.178   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 98.126.0.98  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 107.183.113.242  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.245.73.18   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 98.126.4.194   | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.89.185.2  | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 174.139.162.50   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 174.139.83.4   | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 107.183.246.226  | September 3, 2015 |                    | Streaming Video                                |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.86   | September 3, 2015 |                    | Streaming Video                                |
| Cloudflare<br>(res.sinohao.com.cdn.cloudflare.net)      | 104.20.4.235<br>104.20.5.235<br>104.20.7.235<br>104.20.8.235 | September 3, 2015 |                    | TVpad Store Menus/Graphics<br>Infringing Apps  |
| ClearDDoS Technologies<br>Los Angeles, California       | 104.193.92.29  | September 3, 2015 | cmsres.wsxlist.com | TVpad Store Menus/ Graphics<br>Infringing Apps |
| Enzu<br>Los Angeles, California                         | 23.245.203.54  | September 3, 2015 | bi4.wsxlist.com    | TVpad4 Store Menus/Graphics                    |
| Enzu  | 23.245.203.54  | September 3, 2015 | btvstb.xqlzoy.com  | TVpad4 Store Menus/Graphics                    |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address     | Date of detection | Domain Name          | Function   |
|---|----------------|-------------------|----------------------|--|
| Los Angeles, California                           |                |                   |                      |  |
| Enzu<br>Los Angeles, California                   | 23.245.203.54  | September 3, 2015 | stbepg.qaxlist.com   | TVpad4 Store Menus/Graphics                                  |
| ZeroDDoS<br>Los Angeles, California               | 167.88.196.51  | September 3, 2015 | res.qaxlist.com      | TVpad Operational Content                                    |
| Enzu<br>Los Angeles, California                   | 23.245.203.54  | September 3, 2015 | sepg.qaxlist.com     | TVpad Operational Content<br>Infringing Apps' Program Guides |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | ykhq.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | gqfc.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | fc.livetvpad.com     | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | yhsy.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | dlgq.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | sports.livetvpad.com | TVpad3 Operational Content                                   |
| PEER 1 Network Inc<br>Santa Ana, CA               | 107.6.45.86    | September 3, 2015 | bsap.wsxlist.com     | TVpad3 Operational Content                                   |
| Krypt Technologies<br>Los Angeles, California     | 174.139.233.3  | September 3, 2015 | tytuepg.wsxlist.com  | TVpad3 Operational Content                                   |
| Nobis Technology<br>Seattle, Washington           | 23.19.131.19   | September 3, 2015 | force2009web.net     | TVpad3 Operational Content                                   |
| LimeStone Networks<br>Dallas, Texas               | 63.143.43.171  | September 3, 2015 | vistv.plbegy.com     | TVpad4 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.12.143 | September 3, 2015 | gyyyer.plbegy.com    | TVpad4 Operational Content                                   |
| Hostspace Networks<br>Los Angeles, California     | 198.44.250.177 | September 3, 2015 | mhleve.oyhrtp.com    | TVpad4 Operational Content                                   |
| LimeStone Networks<br>Dallas, Texas               | 74.63.227.30   | September 3, 2015 | npxyc.prsolive.com   | TVpad4 Operational Content                                   |
| Hostspace Networks<br>Los Angeles, California     | 23.234.51.152  | September 3, 2015 | canpic.vdese.com     | VOD Thumbnail graphics                                       |
| Hostspace Networks                                | 162.211.182.49 | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.71   | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.65   | November 25, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.72   | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| ClearDDoS Technologies                            | 104.193.92.29  | January 30, 2015  |                      | TVpad Authorization  |
| Defender cloud international                      | 23.234.42.67   | January 30, 2015  |                      | TVpad Authorization  |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address      | Date of detection | Domain Name | Function   |
|---|-----------------|-------------------|-------------|--|
| ClearDDoS Technologies                      | 23.234.42.66    | November 25, 2014 |             | TVpad Store Menus/Graphics                                   |
| Datashack                                   | 198.204.242.5   | November 25, 2014 |             | TVpad Store Menus/ Graphics<br>Infringing Apps               |
| ClearDDoS Technologies                      | 103.240.140.149 | January 30, 2015  |             | TVpad4 Store Menus/Graphics                                  |
| CloudDDoS                                   | 168.235.240.115 | January 30, 2015  |             | TVpad Operational Content                                    |
| Sharktech                                   | 107.167.14.146  | November 25, 2014 |             | TVpad Operational Content                                    |
| CloudDDoS                                   | 168.235.240.115 | January 30, 2015  |             | TVpad Operational Content<br>Infringing Apps' Program Guides |
| Defender cloud international                | 23.234.40.235   | November 25, 2014 |             | TVpad Operational Content                                    |
| China Telecom                               | 23.234.40.235   | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Nobis Technology                            | 23.105.74.107   | November 25, 2014 |             | TVpad Operational Content                                    |
| Enzu  | 23.88.131.131   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Protected by Cloudflare<br>Location unknown | 104.28.24.55    | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Sharktech                                   | 107.167.7.34    | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Chinanet<br>China                           | 61.174.48.109   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies                      | 162.221.13.44   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Hostspace Networks                          | 162.211.182.173 | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Hostspace Networks                          | 162.211.182.173 | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Sharktech                                   | 107.167.15.67   | November 25, 2014 |             | VOD Thumbnail graphics                                       |
| ClearDDoS Technologies                      | 103.240.140.142 | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| Defender cloud international                | 23.234.42.71    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| Defender cloud international                | 23.234.42.65    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                         | IP address      | Date of detection | Domain Name | Function   |
|------------------------------|-----------------|-------------------|-------------|--|
| Defender cloud international | 23.234.42.72    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| ClearDDoS Technologies       | 104.193.92.29   | June 24, 2015     |             | TVpad Authorization  |
| Defender cloud international | 23.234.42.67    | June 24, 2015     |             | TVpad Authorization  |
| Sharktech                    | 107.167.14.141  | June 24, 2015     |             | TVpad Store Menus/Graphics                                   |
| ClearDDoS Technologies       | 104.193.92.8    | June 24, 2015     |             | TVpad Store Menus/ Graphics<br>Infringing Apps               |
| Enzu                         | 23.245.203.53   | June 24, 2015     |             | TVpad4 Store Menus/Graphics                                  |
| Hostspace Networks           | 162.211.182.173 | June 24, 2015     |             | TVpad Operational Content                                    |
| Sharktech                    | 107.167.14.140  | June 24, 2015     |             | TVpad Operational Content<br>Infringing Apps' Program Guides |
| Defender cloud international | 23.234.40.235   | June 24, 2015     |             | TVpad Operational Content                                    |
| Defender cloud international | 23.234.40.235   | June 24, 2015     |             | TVpad Operational Content                                    |
| Cloud-CN                     | 103.232.215.133 | June 24, 2015     |             | TVpad Operational Content                                    |
| Cloud-CN                     | 103.232.215.133 | June 24, 2015     |             | TVpad Operational Content                                    |
| Nobis Technology             | 23.105.74.107   | June 24, 2015     |             | TVpad Operational Content                                    |
| Hostspace Networks           | 23.234.51.85    | June 24, 2015     |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies       | 162.221.12.143  | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Chinanet<br>China            | 61.174.48.109   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies       | 162.221.13.44   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Gorilla Servers              | 146.71.102.90   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Hostspace Networks           | 162.211.182.173 | June 24, 2015     |             | TVpad4 Operational Content                                   |
| CloudDDOS                    | 168.235.240.115 | June 24, 2015     |             | VOD Thumbnail graphics                                       |
| Enzu                         | 104.151.28.194  | January 30, 2015  |             | Streaming Video  |
| Cloudddos Technology         | 104.171.230.30  | January 30, 2015  |             | Streaming Video  |
| Enzu                         | 23.89.39.194    | January 30, 2015  |             | Streaming Video  |
| Cloudddos Technology         | 168.235.240.149 | January 30, 2015  |             | Streaming Video  |



**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                   | IP address      | Date of detection | Domain Name | Function        |
|------------------------|-----------------|-------------------|-------------|-----------------|
| Clearddos Technologies | 104.193.92.111  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.41   | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies | 104.193.92.60   | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 30, 2015  |             | Streaming Video |
| Esited                 | 104.171.230.23  | January 30, 2015  |             | Streaming Video |
| Esited                 | 104.171.230.16  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.240.65  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.10  | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies | 23.234.41.9     | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 98.126.14.26    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.30  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.240.149 | January 23, 2015  |             | Streaming Video |
| ClearDDoS Technologies | 104.193.92.111  | January 23, 2015  |             | Streaming Video |
| Esited                 | 192.225.233.202 | January 23, 2015  |             | Streaming Video |
| Enzu                   | 104.151.28.194  | January 23, 2015  |             | Streaming Video |
| Enzu                   | 199.48.69.146   | January 23, 2015  |             | Streaming Video |
| Enzu                   | 23.89.39.194    | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.70  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.70  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 67.198.192.3    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 30, 2015  |             | Streaming Video |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                         | IP address      | Date of detection | Domain Name | Function        |
|------------------------------|-----------------|-------------------|-------------|-----------------|
| Krypt Technologies           | 98.126.14.26    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology         | 104.171.230.72  | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies       | 162.221.12.215  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology         | 168.235.241.60  | January 30, 2015  |             | Streaming Video |
| Krypt Technologies           | 98.126.14.26    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology         | 168.235.241.77  | January 30, 2015  |             | Streaming Video |
| Leaseweb                     | 162.210.198.179 | January 30, 2015  |             | Streaming Video |
| Krypt Technologies           | 67.198.192.3    | January 30, 2015  |             | Streaming Video |
| CloudDDOS                    | 168.235.240.79  | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.12  | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.173 | June 25, 2015     |             | Streaming Video |
| ClearDDOS                    | 104.193.92.62   | June 25, 2015     |             | Streaming Video |
| ZERO DDOS LLC                | 104.167.81.52   | June 25, 2015     |             | Streaming Video |
| Sharktech                    | 107.167.15.100  | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 104.171.230.32  | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.79  | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.241.12  | June 25, 2015     |             | Streaming Video |
| ZERO DDOS LLC                | 104.167.81.52   | June 25, 2015     |             | Streaming Video |
| CloudDDOS                    | 104.171.230.25  | June 25, 2015     |             | Streaming Video |
| Defender cloud international | 23.234.41.14    | June 25, 2015     |             | Streaming Video |
| Enzu                         | 107.183.236.115 | June 23-25, 2015  |             | Streaming Video |
| Krypt Technologies           | 67.198.192.3    | June 23-25, 2015  |             | Streaming Video |
| CloudDDOS                    | 104.171.230.87  | June 24-25, 2015  |             | Streaming Video |
| Krypt Technologies           | 174.139.162.52  | June 24-25, 2015  |             | Streaming Video |
| CloudDDOS                    | 104.171.230.25  | June 26, 2015     |             | Streaming Video |
| Defender cloud international | 23.234.41.14    | June 26, 2015     |             | Streaming Video |
| CloudDDOS                    | 104.171.230.32  | June 26, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.79  | June 26, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.173 | June 26, 2015     |             | Streaming Video |
| ZERO DDOS LLC                | 104.167.81.52   | June 26, 2015     |             | Streaming Video |
| Krypt Technologies           | 174.139.83.4    | June 26, 2015     |             | Streaming Video |
| CloudDDOS                    | 168.235.240.115 | June 26, 2015     |             | Streaming Video |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                        | IP address                      | Date of detection                | Domain Name | Function  |
|-----------------------------|---------------------------------|----------------------------------|-------------|---|
| Krypt Technologies          | 67.198.192.3                    | June 26, 2015                    |             | Streaming Video   |
| Krypt Technologies          | 98.126.4.194                    | June 26, 2015                    |             | Streaming Video   |
| Krypt Technologies          | 98.126.14.27                    | June 26, 2015                    |             | Streaming Video   |
| Hostspace Networks          | 162.211.182.173                 | June 26, 2015                    |             | TVpad 3 Operational Content   |
| ClearDDoS Technologies      | 162.221.15.179                  | June 26, 2015                    |             | TVpad 3 Operational Content   |
| Sharktech                   | 208.98.26.130                   | June 26, 2015                    |             | TVpad 3 Operational Content   |
| Hostspace Networks          | 162.211.182.166                 | June 26, 2015                    |             | TVpad3 Operational Content  |
| Enzu                        | 198.56.193.123                  | June 26, 2015                    |             | Streaming Video   |
| ZERO DDOS LLC               | 167.88.195.51                   | June 26, 2015                    |             | Streaming Video   |
| Sharktech                   | 104.171.230.3                   | June 26, 2015                    |             | Streaming Video   |
| Enzu                        | 23.89.197.35                    | June 26, 2015                    |             | Streaming Video   |
| Krypt Technologies          | 67.198.158.171                  | June 26, 2015                    |             | Streaming Video   |
| SolidTools                  | 198.40.56.19                    | June 26, 2015                    |             | Streaming Video   |
| CloudDDOS                   | 168.235.240.20                  | June 26, 2015                    |             | Streaming Video   |
| <a href="#">C3 Networks</a> | <a href="#">206.226.64.44</a>   | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">206.226.64.179</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.129.22</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.131.5</a>   | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.28.205</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.155.8.40</a>    | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.155.5.42</a>    | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.128.54</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.146.14</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.128.102</a> | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.128.114</a> | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.128.98</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">C3 Networks</a> | <a href="#">107.151.131.134</a> | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>   |
| <a href="#">Hostspace</a>   | <a href="#">192.126.116.213</a> | <a href="#">October 21, 2015</a> |             | <a href="#">TVpad Operational Content</a>                               |
| <a href="#">Sharktech</a>   | <a href="#">104.37.247.147</a>  | <a href="#">October 21, 2015</a> |             | <a href="#">DNS Lookup</a><br><a href="#">TVpad Operational Content</a> |
| <a href="#">Sharktech</a>   | <a href="#">208.98.42.195</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">TVpad Operational Content</a>                               |
| <a href="#">Sharktech</a>   | <a href="#">174.128.243.36</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>   |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                                  | IP address                      | Date of detection                | Domain Name | Function                                  |
|---------------------------------------|---------------------------------|----------------------------------|-------------|---|
| <a href="#">Limestone Networks</a>    | <a href="#">63.143.43.171</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">TVpad Operational Content</a> |
| <a href="#">ZBUSA</a>                 | <a href="#">192.225.233.60</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">TVpad Operational Content</a> |
| <a href="#">Perfect International</a> | <a href="#">70.36.96.245</a>    | <a href="#">October 15, 2015</a> |             | <a href="#">TVpad Operational Content</a> |
| <a href="#">Enzu</a>                  | <a href="#">104.171.230.102</a> | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.171.230.79</a>  | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.171.230.74</a>  | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.155.5.42</a>    | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.244.42.226</a>   | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.167.81.52</a>   | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.244.84.226</a>   | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.89.197.34</a>    | <a href="#">October 21, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.183.113.245</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.151.28.205</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.171.230.92</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.246.229</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Krypt</a>                 | <a href="#">98.126.0.102</a>    | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Krypt</a>                 | <a href="#">98.126.4.198</a>    | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Krypt</a>                 | <a href="#">67.198.128.30</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Leaseweb</a>              | <a href="#">207.244.83.48</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.202.82.182</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.113.246</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.236.118</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.244.76.190</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">199.48.69.142</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.246.118</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.89.185.6</a>     | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">104.151.28.206</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.88.126.14</a>    | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.246.230</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.244.76.189</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">23.244.82.102</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |
| <a href="#">Enzu</a>                  | <a href="#">107.183.246.117</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a>           |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                  | IP address                      | Date of detection                | Domain Name | Function                        |
|-----------------------|---------------------------------|----------------------------------|-------------|---------------------------------|
| <a href="#">Enzu</a>  | <a href="#">23.234.51.153</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">23.234.51.193</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">23.244.76.186</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">199.48.69.138</a>   | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">23.88.126.10</a>    | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">104.151.28.202</a>  | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">107.183.246.114</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Enzu</a>  | <a href="#">107.183.236.114</a> | <a href="#">October 15, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Tzulo</a> | <a href="#">206.226.64.44</a>   | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a> |
| <a href="#">Tzulo</a> | <a href="#">206.226.64.179</a>  | <a href="#">October 14, 2015</a> |             | <a href="#">Streaming Video</a> |



**Exhibit D**  
**Third-Party TVpad Distributors**

|   |  |
|---|--|
| 3G TV Box LLC   | Feng Lin   |
| Amilkar Trading Inc   | Financial Systems Support Inc / Romolo Depaolis                    |
| Anton International Inc.  | Formark Resource & Asset Management                                |
| Asian Trade Ventures Inc  | Galaxy Talk Inc  |
| ATA Chung's Taekwondo, Inc                                      | George Thai / Katherine Thai                                       |
| AVC Group Inc   | Gershon Zilber   |
| B.K.A. Trading Inc  | Golden Ocean Sales, Inc.   |
| Bay Media Star Inc  | Hair Plaza, Inc  |
| Bee Lin Tey / Peter K. Tsui                                     | Hawaiian Tel FCU / Gary Su   |
| Caytan Enterprise LLC   | He Zhen Li   |
| Chin Chen Chang / Cheetah Trading Co                            | Henda International Trading Inc d/b/a Hengda International Trading |
| CHM Int'l Trading Inc.  | Hester Fashion of Chinatown Inc                                    |
| Chong Seon Yi / Young Ok Woo                                    | Hui Duan Chen / Dingren Luo  |
| Christine Enterprises, Inc.                                     | Ja-De Trading Corp   |
| Christine Tang / Wai K Tang                                     | Ja-De Trading Corp.  |
| Chuang Wei Technology LLC (Yu Shao)                             | James T Chan   |
| City Home Improvement Corp d/b/a 8th Ave Electronic & Appliance | James Yang   |
| Collection of Beauty LLC  | Jia R Chen   |
| CR Trading Co.  | Jiajie Shen  |
| Crystal Clear Satellite Inc                                     | Jianming Shen  |
| CV Construction LLC   | Jin Feng Li / Yong Qing Huang                                      |
| Daming Huang  | Jing Wen Li  |
| Dynamic Distribution Warehouse                                  | Johnson Chau   |
| Dynamic Sports Group, Inc.                                      | K & K Computer Repairs Center Inc.                                 |
| ECR International USA Inc                                       | K & M Store LLC / Ken's Electronics LLC                            |
| Effulgent Inc   | K & Y Car Accessories Inc  |
| Electronic Land Inc   | Kaiyee Ng  |
| Eugene Zhou / Bill Dao Bian Qi / Chi Wing Ma                    | Ka-Ling Leung d/b/a Global Multimedia                              |
| Face Entertainment Ltd  | Kar Li Wong  |

|                                    |   |
|------------------------------------|---|
| Ken's Electronics LLC              | Top Star Satellite Inc                    |
| Kenneth W Chan                     | True Beauty Trading Inc.                  |
| Kwok Li                            | Tu Da Trading Inc                         |
| L&D                                | TV Pad Center Inc d/b/a TV Pad Center     |
| Laura Tong                         | W Sweet & Sweet Inc d/b/a Ocean5 Inc      |
| LCL General Contractor Inc         | Wai Kwong Tang                            |
| Li Po Wu                           | Walon International Inc                   |
| Li Shu Liang                       | Watsing Inc                               |
| Lianju Zhang / Zhong Zhong Zang    | Wei Hua Liang                             |
| Li-Jun Tan                         | Wei Yem Lum                               |
| Linhui Yang                        | Weidong Lu / Ling Sheng                   |
| M & J Electronics 2012 Inc         | Westfield Industrial Corp                 |
| Marianne H S Choi / Kwong Hon Chan | Wing Hing Wood Furnishing Inc             |
| Mavsak Inc                         | Xiu Ying Huang                            |
| May Dang                           | Y S International Inc t/a Travel Galleria |
| Media Journal Inc                  | Yan Bian                                  |
| Minerva Synergy LLC                | Yan Ni Gu                                 |
| Mirage Entertainment               | Yan Zheng Yang                            |
| Mr Zi Rui Lin                      | Yanjie Shen                               |
| NY Toner Inc                       | Yeon Soo Byun / Young S Byun              |
| PA Security Camera                 | Yong Ji Tan                               |
| Qamar Abbas                        | Zhang Z Zhong                             |
| Qing Hua Li / Jie Lin              | Zhong T Huang / Zhong Liang Huang         |
| Raymond Tam                        |   |
| RBS Citizens, NA                   |   |
| Red Star Internet Inc              |   |
| Redsea Consultants Corp            |   |
| S . D Italia SRL                   |   |
| S.D.H. Entertainment, Inc          |   |
| Siu C Ng                           |   |
| Sky Dragon Appliance Inc.          |   |
| STV Satellite Co.                  |   |
| Toner.com Inc                      |   |



| <u>Party</u>                       | <u>Account Number(s)</u>  |
|------------------------------------|---|
| <u>United Parcel Service (UPS)</u> | <u>060Y6F</u><br><u>AT1665</u><br><u>1985V3</u><br><u>936E3E</u><br><u>6V0067</u> |
| <u>DHL Express</u>                 | <u>602194729</u>  |



## **EXHIBIT C**

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address      | Date of detection | Domain Name        | Function                                     |
|---|-----------------|-------------------|--------------------|--|
| ClearDDoS Technologies<br>Los Angeles, California       | 103.240.140.142 | September 3, 2015 | xz.boxepg.com      | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.71    | September 3, 2015 | xzsec.boxepg.com   | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.65    | September 3, 2015 | xzsec.padepg.com   | Initialization<br>TVpad3 Operational Content |
| Defender cloud international<br>Los Angeles, California | 23.234.42.72    | September 3, 2015 | xzsec.listebox.com | Initialization<br>TVpad3 Operational Content |
| Perfect International, Inc<br>Los Angeles, California   | 70.36.96.245    | September 3, 2015 | stbepg.wsxlist.com | TVpad3 Authentication                        |
| Enzu<br>Los Angeles, California                         | 23.245.203.54   | September 3, 2015 | stbepg.qaxlist.com | TVpad4 Authentication                        |
| Defender cloud international<br>Los Angeles, California | 23.234.41.173   | September 3, 2015 |                    | Streaming Video                              |
| ClearDDoS Technologies<br>Los Angeles, California       | 104.193.92.42   | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.101 | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.39    | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.167.81.51   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.188.195 | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.26    | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.188.194 | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.9.243   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.172.19  | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.33    | September 3, 2015 |                    | Streaming Video                              |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.82  | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.181.227 | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 170.178.182.3   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.4.227   | September 3, 2015 |                    | Streaming Video                              |
| Sharktech<br>Los Angeles, California                    | 107.167.18.227  | September 3, 2015 |                    | Streaming Video                              |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address   | Date of detection | Domain Name        | Function                                       |
|---|--|-------------------|--------------------|--|
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.74   | September 3, 2015 |                    | Streaming Video                                |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.19   | September 3, 2015 |                    | Streaming Video                                |
| ClearDDoS Technologies<br>Los Angeles, California       | 162.221.13.98  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.89.100.59   | September 3, 2015 |                    | Streaming Video                                |
| CloudDDoS Technologies<br>San Jose, California          | 45.61.239.75   | September 3, 2015 |                    | Streaming Video                                |
| ZeroDDoS<br>Los Angeles, California                     | 104.201.61.3   | September 3, 2015 |                    | Streaming Video                                |
| ZeroDDoS<br>Los Angeles, California                     | 167.88.205.116   | September 3, 2015 |                    | Streaming Video                                |
| Cloudflare  | 104.20.4.235   | September 3, 2015 |                    | Streaming Video                                |
| Defender cloud international<br>Los Angeles, California | 23.234.41.171  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 104.202.82.178   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 98.126.0.98  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 107.183.113.242  | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.245.73.18   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 98.126.4.194   | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 23.89.185.2  | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 174.139.162.50   | September 3, 2015 |                    | Streaming Video                                |
| Krypt Technologies<br>Los Angeles, California           | 174.139.83.4   | September 3, 2015 |                    | Streaming Video                                |
| Enzu<br>Los Angeles, California                         | 107.183.246.226  | September 3, 2015 |                    | Streaming Video                                |
| CloudDDoS Technologies<br>San Jose, California          | 104.171.230.86   | September 3, 2015 |                    | Streaming Video                                |
| Cloudflare (res.sinohao.com<br>.cdn.cloudflare.net)     | 104.20.4.235<br>104.20.5.235<br>104.20.7.235<br>104.20.8.235 | September 3, 2015 |                    | TVpad Store Menus/Graphics<br>Infringing Apps  |
| ClearDDoS Technologies<br>Los Angeles, California       | 104.193.92.29  | September 3, 2015 | cmsres.wsxlist.com | TVpad Store Menus/ Graphics<br>Infringing Apps |
| Enzu<br>Los Angeles, California                         | 23.245.203.54  | September 3, 2015 | bi4.wsxlist.com    | TVpad4 Store Menus/Graphics                    |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address     | Date of detection | Domain Name          | Function   |
|---|----------------|-------------------|----------------------|--|
| Enzu<br>Los Angeles, California                   | 23.245.203.54  | September 3, 2015 | btvstb.xqlzoy.com    | TVpad4 Store Menus/Graphics                                  |
| Enzu<br>Los Angeles, California                   | 23.245.203.54  | September 3, 2015 | stbepg.qaxlist.com   | TVpad4 Store Menus/Graphics                                  |
| ZeroDDoS<br>Los Angeles, California               | 167.88.196.51  | September 3, 2015 | res.qaxlist.com      | TVpad Operational Content                                    |
| Enzu<br>Los Angeles, California                   | 23.245.203.54  | September 3, 2015 | sepg.qaxlist.com     | TVpad Operational Content<br>Infringing Apps' Program Guides |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | ykhplivetvpad.com    | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | gqfc.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | fc.livetvpad.com     | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | yhsy.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | dlgq.livetvpad.com   | TVpad3 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.15.79  | September 3, 2015 | sports.livetvpad.com | TVpad3 Operational Content                                   |
| PEER 1 Network Inc<br>Santa Ana, CA               | 107.6.45.86    | September 3, 2015 | bsap.wsxlist.com     | TVpad3 Operational Content                                   |
| Krypt Technologies<br>Los Angeles, California     | 174.139.233.3  | September 3, 2015 | tytuepg.wsxlist.com  | TVpad3 Operational Content                                   |
| Nobis Technology<br>Seattle, Washington           | 23.19.131.19   | September 3, 2015 | force2009web.net     | TVpad3 Operational Content                                   |
| LimeStone Networks<br>Dallas, Texas               | 63.143.43.171  | September 3, 2015 | vistv.plbegy.com     | TVpad4 Operational Content                                   |
| ClearDDoS Technologies<br>Los Angeles, California | 162.221.12.143 | September 3, 2015 | gyyyer.plbegy.com    | TVpad4 Operational Content                                   |
| Hostspace Networks<br>Los Angeles, California     | 198.44.250.177 | September 3, 2015 | mhleve.oyhrtp.com    | TVpad4 Operational Content                                   |
| LimeStone Networks<br>Dallas, Texas               | 74.63.227.30   | September 3, 2015 | npxyc.prsolive.com   | TVpad4 Operational Content                                   |
| Hostspace Networks<br>Los Angeles, California     | 23.234.51.152  | September 3, 2015 | canpic.vdese.com     | VOD Thumbnail graphics                                       |
| Hostspace Networks                                | 162.211.182.49 | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.71   | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.65   | November 25, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| Defender cloud international                      | 23.234.42.72   | December 14, 2014 |                      | DNS Lookup TVpad Operational Content                         |
| ClearDDoS Technologies                            | 104.193.92.29  | January 30, 2015  |                      | TVpad Authorization  |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address      | Date of detection | Domain Name | Function   |
|---|-----------------|-------------------|-------------|--|
| Defender cloud international                | 23.234.42.67    | January 30, 2015  |             | TVpad Authorization  |
| ClearDDoS Technologies                      | 23.234.42.66    | November 25, 2014 |             | TVpad Store Menus/Graphics                                   |
| Datashack                                   | 198.204.242.5   | November 25, 2014 |             | TVpad Store Menus/ Graphics<br>Infringing Apps               |
| ClearDDoS Technologies                      | 103.240.140.149 | January 30, 2015  |             | TVpad4 Store Menus/Graphics                                  |
| CloudDDOS                                   | 168.235.240.115 | January 30, 2015  |             | TVpad Operational Content                                    |
| Sharktech                                   | 107.167.14.146  | November 25, 2014 |             | TVpad Operational Content                                    |
| CloudDDOS                                   | 168.235.240.115 | January 30, 2015  |             | TVpad Operational Content<br>Infringing Apps' Program Guides |
| Defender cloud international                | 23.234.40.235   | November 25, 2014 |             | TVpad Operational Content                                    |
| China Telecom                               | 23.234.40.235   | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Hostspace Networks                          | 162.211.182.173 | November 25, 2014 |             | TVpad Operational Content                                    |
| Nobis Technology                            | 23.105.74.107   | November 25, 2014 |             | TVpad Operational Content                                    |
| Enzu  | 23.88.131.131   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Protected by Cloudflare<br>Location unknown | 104.28.24.55    | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Sharktech                                   | 107.167.7.34    | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Chinanet<br>China                           | 61.174.48.109   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies                      | 162.221.13.44   | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Hostspace Networks                          | 162.211.182.173 | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Hostspace Networks                          | 162.211.182.173 | January 30, 2015  |             | TVpad4 Operational Content                                   |
| Sharktech                                   | 107.167.15.67   | November 25, 2014 |             | VOD Thumbnail graphics                                       |
| ClearDDoS Technologies                      | 103.240.140.142 | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| Defender cloud international                | 23.234.42.71    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| Defender cloud international                | 23.234.42.65    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| Defender cloud international                | 23.234.42.72    | June 24, 2015     |             | DNS Lookup<br>TVpad Operational Content                      |
| ClearDDoS Technologies                      | 104.193.92.29   | June 24, 2015     |             | TVpad Authorization  |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                         | IP address      | Date of detection | Domain Name | Function   |
|------------------------------|-----------------|-------------------|-------------|--|
| Defender cloud international | 23.234.42.67    | June 24, 2015     |             | TVpad Authorization  |
| Sharktech                    | 107.167.14.141  | June 24, 2015     |             | TVpad Store Menus/Graphics                                   |
| ClearDDoS Technologies       | 104.193.92.8    | June 24, 2015     |             | TVpad Store Menus/ Graphics<br>Infringing Apps               |
| Enzu                         | 23.245.203.53   | June 24, 2015     |             | TVpad4 Store Menus/Graphics                                  |
| Hostspace Networks           | 162.211.182.173 | June 24, 2015     |             | TVpad Operational Content                                    |
| Sharktech                    | 107.167.14.140  | June 24, 2015     |             | TVpad Operational Content<br>Infringing Apps' Program Guides |
| Defender cloud international | 23.234.40.235   | June 24, 2015     |             | TVpad Operational Content                                    |
| Defender cloud international | 23.234.40.235   | June 24, 2015     |             | TVpad Operational Content                                    |
| Cloud-CN                     | 103.232.215.133 | June 24, 2015     |             | TVpad Operational Content                                    |
| Cloud-CN                     | 103.232.215.133 | June 24, 2015     |             | TVpad Operational Content                                    |
| Nobis Technology             | 23.105.74.107   | June 24, 2015     |             | TVpad Operational Content                                    |
| Hostspace Networks           | 23.234.51.85    | June 24, 2015     |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies       | 162.221.12.143  | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Chinanet<br>China            | 61.174.48.109   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| ClearDDoS Technologies       | 162.221.13.44   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Gorilla Servers              | 146.71.102.90   | June 24, 2015     |             | TVpad4 Operational Content                                   |
| Hostspace Networks           | 162.211.182.173 | June 24, 2015     |             | TVpad4 Operational Content                                   |
| CloudDDOS                    | 168.235.240.115 | June 24, 2015     |             | VOD Thumbnail graphics                                       |
| Enzu                         | 104.151.28.194  | January 30, 2015  |             | Streaming Video  |
| Cloudddos<br>Technology      | 104.171.230.30  | January 30, 2015  |             | Streaming Video  |
| Enzu                         | 23.89.39.194    | January 30, 2015  |             | Streaming Video  |
| Cloudddos Technology         | 168.235.240.149 | January 30, 2015  |             | Streaming Video  |
| Clearddos Technologies       | 104.193.92.111  | January 30, 2015  |             | Streaming Video  |
| Cloudddos Technology         | 168.235.241.77  | January 30, 2015  |             | Streaming Video  |
| Clearddos Technologies       | 162.221.12.41   | January 30, 2015  |             | Streaming Video  |
| Clearddos Technologies       | 104.193.92.60   | January 30, 2015  |             | Streaming Video  |
| Cloudddos Technology         | 168.235.241.60  | January 30, 2015  |             | Streaming Video  |



**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                   | IP address      | Date of detection | Domain Name | Function        |
|------------------------|-----------------|-------------------|-------------|-----------------|
| Esited                 | 104.171.230.23  | January 30, 2015  |             | Streaming Video |
| Esited                 | 104.171.230.16  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.240.65  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.10  | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies | 23.234.41.9     | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 98.126.14.26    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.30  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.240.149 | January 23, 2015  |             | Streaming Video |
| ClearDDoS Technologies | 104.193.92.111  | January 23, 2015  |             | Streaming Video |
| Esited                 | 192.225.233.202 | January 23, 2015  |             | Streaming Video |
| Enzu                   | 104.151.28.194  | January 23, 2015  |             | Streaming Video |
| Enzu                   | 199.48.69.146   | January 23, 2015  |             | Streaming Video |
| Enzu                   | 23.89.39.194    | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.70  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.70  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 23, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 23, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 67.198.192.3    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.77  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 98.126.14.26    | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 104.171.230.72  | January 30, 2015  |             | Streaming Video |
| Clearddos Technologies | 162.221.12.215  | January 30, 2015  |             | Streaming Video |
| Cloudddos Technology   | 168.235.241.60  | January 30, 2015  |             | Streaming Video |
| Krypt Technologies     | 98.126.14.26    | January 30, 2015  |             | Streaming Video |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                         | IP address      | Date of detection | Domain Name | Function                    |
|------------------------------|-----------------|-------------------|-------------|-----------------------------|
| Cloudddos Technology         | 168.235.241.77  | January 30, 2015  |             | Streaming Video             |
| Leaseweb                     | 162.210.198.179 | January 30, 2015  |             | Streaming Video             |
| Krypt Technologies           | 67.198.192.3    | January 30, 2015  |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.79  | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.12  | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.173 | June 25, 2015     |             | Streaming Video             |
| ClearDDOS                    | 104.193.92.62   | June 25, 2015     |             | Streaming Video             |
| ZERO DDOS LLC                | 104.167.81.52   | June 25, 2015     |             | Streaming Video             |
| Sharktech                    | 107.167.15.100  | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 104.171.230.32  | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.79  | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.241.12  | June 25, 2015     |             | Streaming Video             |
| ZERO DDOS LLC                | 104.167.81.52   | June 25, 2015     |             | Streaming Video             |
| CloudDDOS                    | 104.171.230.25  | June 25, 2015     |             | Streaming Video             |
| Defender cloud international | 23.234.41.14    | June 25, 2015     |             | Streaming Video             |
| Enzu                         | 107.183.236.115 | June 23-25, 2015  |             | Streaming Video             |
| Krypt Technologies           | 67.198.192.3    | June 23-25, 2015  |             | Streaming Video             |
| CloudDDOS                    | 104.171.230.87  | June 24-25, 2015  |             | Streaming Video             |
| Krypt Technologies           | 174.139.162.52  | June 24-25, 2015  |             | Streaming Video             |
| CloudDDOS                    | 104.171.230.25  | June 26, 2015     |             | Streaming Video             |
| Defender cloud international | 23.234.41.14    | June 26, 2015     |             | Streaming Video             |
| CloudDDOS                    | 104.171.230.32  | June 26, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.79  | June 26, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.173 | June 26, 2015     |             | Streaming Video             |
| ZERO DDOS LLC                | 104.167.81.52   | June 26, 2015     |             | Streaming Video             |
| Krypt Technologies           | 174.139.83.4    | June 26, 2015     |             | Streaming Video             |
| CloudDDOS                    | 168.235.240.115 | June 26, 2015     |             | Streaming Video             |
| Krypt Technologies           | 67.198.192.3    | June 26, 2015     |             | Streaming Video             |
| Krypt Technologies           | 98.126.4.194    | June 26, 2015     |             | Streaming Video             |
| Krypt Technologies           | 98.126.14.27    | June 26, 2015     |             | Streaming Video             |
| Hostspace Networks           | 162.211.182.173 | June 26, 2015     |             | TVpad 3 Operational Content |
| ClearDDoS Technologies       | 162.221.15.179  | June 26, 2015     |             | TVpad 3 Operational Content |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host                  | IP address      | Date of detection | Domain Name                              | Function                                |
|-----------------------|-----------------|-------------------|--|---|
| Sharktech             | 208.98.26.130   | June 26, 2015     |  | TVpad 3 Operational Content             |
| Hostspace Networks    | 162.211.182.166 | June 26, 2015     |  | TVpad3 Operational Content              |
| Enzu                  | 198.56.193.123  | June 26, 2015     |  | Streaming Video                         |
| ZERO DDOS LLC         | 167.88.195.51   | June 26, 2015     |  | Streaming Video                         |
| Sharktech             | 104.171.230.3   | June 26, 2015     |  | Streaming Video                         |
| Enzu                  | 23.89.197.35    | June 26, 2015     |  | Streaming Video                         |
| Krypt Technologies    | 67.198.158.171  | June 26, 2015     |  | Streaming Video                         |
| SolidTools            | 198.40.56.19    | June 26, 2015     |  | Streaming Video                         |
| CloudDDOS             | 168.235.240.20  | June 26, 2015     |  | Streaming Video                         |
| C3 Networks           | 206.226.64.44   | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 206.226.64.179  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.129.22  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.131.5   | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.28.205  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.155.8.40    | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.155.5.42    | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.128.54  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.146.14  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.128.102 | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.128.114 | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.128.98  | October 14, 2015  |  | Streaming Video                         |
| C3 Networks           | 107.151.131.134 | October 21, 2015  |  | Streaming Video                         |
| Hostspace             | 192.126.116.213 | October 21, 2015  |  | TVpad Operational Content               |
| Sharktech             | 104.37.247.147  | October 21, 2015  | xz.boxepg.com                            | DNS Lookup<br>TVpad Operational Content |
| Sharktech             | 208.98.42.195   | October 15, 2015  | bi4.wsxlist.com<br>stbepg.qaxlist.com    | TVpad Operational Content               |
| Sharktech             | 174.128.243.36  | October 15, 2015  | btvstb.xqlzoy.com                        | Streaming Video                         |
| Limestone Networks    | 63.143.43.171   | October 15, 2015  | vistv.plbegy.com                         | TVpad Operational Content               |
| ZBUSA                 | 192.225.233.60  | October 14, 2015  |  | TVpad Operational Content               |
| Perfect International | 70.36.96.245    | October 15, 2015  | stbepg.wsxlist.com<br>cmsres.wsxlist.com | TVpad Operational Content               |
| Enzu                  | 104.171.230.102 | October 21, 2015  |  | Streaming Video                         |
| Enzu                  | 104.171.230.79  | October 21, 2015  |  | Streaming Video                         |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host     | IP address      | Date of detection | Domain Name | Function        |
|----------|-----------------|-------------------|-------------|-----------------|
| Enzu     | 104.171.230.74  | October 21, 2015  |             | Streaming Video |
| Enzu     | 107.155.5.42    | October 21, 2015  |             | Streaming Video |
| Enzu     | 23.244.42.226   | October 21, 2015  |             | Streaming Video |
| Enzu     | 104.167.81.52   | October 21, 2015  |             | Streaming Video |
| Enzu     | 23.244.84.226   | October 21, 2015  |             | Streaming Video |
| Enzu     | 23.89.197.34    | October 21, 2015  |             | Streaming Video |
| Enzu     | 104.183.113.245 | October 15, 2015  |             | Streaming Video |
| Enzu     | 104.151.28.205  | October 15, 2015  |             | Streaming Video |
| Enzu     | 104.171.230.92  | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.246.229 | October 15, 2015  |             | Streaming Video |
| Krypt    | 98.126.0.102    | October 15, 2015  |             | Streaming Video |
| Krypt    | 98.126.4.198    | October 15, 2015  |             | Streaming Video |
| Krypt    | 67.198.128.30   | October 15, 2015  |             | Streaming Video |
| Leaseweb | 207.244.83.48   | October 15, 2015  |             | Streaming Video |
| Enzu     | 104.202.82.182  | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.113.246 | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.236.118 | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.244.76.190   | October 15, 2015  |             | Streaming Video |
| Enzu     | 199.48.69.142   | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.246.118 | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.89.185.6     | October 15, 2015  |             | Streaming Video |
| Enzu     | 104.151.28.206  | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.88.126.14    | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.246.230 | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.244.76.189   | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.244.82.102   | October 15, 2015  |             | Streaming Video |
| Enzu     | 107.183.246.117 | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.234.51.153   | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.234.51.193   | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.244.76.186   | October 15, 2015  |             | Streaming Video |
| Enzu     | 199.48.69.138   | October 15, 2015  |             | Streaming Video |
| Enzu     | 23.88.126.10    | October 15, 2015  |             | Streaming Video |

**Exhibit C - TVpad Server IP Addresses and Domain Names**

| Host  | IP address      | Date of detection | Domain Name | Function        |
|-------|-----------------|-------------------|-------------|-----------------|
| Enzu  | 104.151.28.202  | October 15, 2015  |             | Streaming Video |
| Enzu  | 107.183.246.114 | October 15, 2015  |             | Streaming Video |
| Enzu  | 107.183.236.114 | October 15, 2015  |             | Streaming Video |
| Tzulo | 206.226.64.44   | October 14, 2015  |             | Streaming Video |
| Tzulo | 206.226.64.179  | October 14, 2015  |             | Streaming Video |